IN THE CIRCUIT COURT OF THE SECOND JUDICIAL CIRCUIT LAWRENCE COUNTY, ILLINOIS

	FULGO
STEPHANIE E. WILLIAMS SHAWN R. WILLIAMS	OCT 5 2017
VERA C. WILLIAMS, Plaintiff,) Peggy Explicit CIRCUIT CLERK, LAWRENCE CO., ILI
v.) CASE NO. 2017- L -
MISHIDA JUNICHI, AND TOYOTA BOSHOKU AMERICA, INC. Defendants.	PLAINTIFFS DEMAND TRIAL BY JURY ON ALL COUNTS

COMPLAINT COUNT I STEPHANIE E. WILLIAMS

COMES now the Plaintiff, Stephanie E. Williams, by and through her attorney, Stephen J. Hough, for her Complaint against the Defendant, MISHIDA JUNICHI and TOYOTA BOSHOKU AMERICA, INC., states as follows:

- 1. That the Plaintiff is a resident of the State of Illinois.
- 2. That Defendant, Mishida Junichi is a resident of the State of Indiana.
- 3. That Defendant, TOYOTA BOSHOKU AMERICA, INC. is a corporation doing business in Lawrence County, Illinois.
- 4. That on October 9, 2015, Plaintiff, Stephanie Williams was driving a 2010 Chrysler van in a Westerly direction along County Road (CR) 900 N. at its intersection of CR 1500 E in Lawrence County, Illinois.
- 5. That at the time and date aforementioned, the Defendant, Mishida Junichi was driving a 2015 Toyota Van in a Southerly direction on CR 1500 E. at its intersection with CR 900 N., in Lawrence County, Illinois.

- 6. That all times herein relevant, the Defendant, Mishida Junichi was an employee of the Defendant, TOYOTA BOSHOKU AMERICA, INC., and was acting within the scope of his employment.
- 7. That at the time, date and location aforementioned, the Defendant, Mishida Junichi, an employee of the Defendant, TOYOTA BOSHOKU AMERICA, INC. caused the vehicle he was driving, owned by Defendant, TOYOTA BOSHOKU AMERICA, INC., to collide with the vehicle being driven by Plaintiff, Stephanie Williams, striking the Plaintiff's vehicle, causing the Plaintiff and her passengers, Shawn R. Williams and Vera C. Williams to be thrown about the vehicle she was driving, causing injuries to Plaintiff, Stephanie E. Williams.
- 8. That said injuries to Plaintiff, Stephanie E. Williams caused her to be transported via ambulance to a hospital for treatment of these injuries.
- 9. That at the time, date and location aforementioned, the Defendant, Mishida Junichi, an employee acting within his scope of employment, was guilty of one or more of the following acts of negligence:
- a. Drove his vehicle at a speed that was unreasonable and improper given the circumstances of the roadway and traffic, in contravention of 625 ILCS 5/11-601(a), the Illinois Vehicle Code.
- b. Drove the vehicle too fast for conditions existing at the time in contravention to 625 ILCS 5/11-601(a), the Illinois Vehicle Code.
- c. Failed to obey a Stop Sign, when being required to stop, in contravention to 625 ILCS 5/11-601(a), the Illinois Vehicle Code.
- d. Failed to decrease speed while approaching and crossing an intersection in contravention to 625 ILCS 5/11-601(a), the Illinois Vehicle Code.
 - e. Was operating his cell phone while driving.
- 10. That as a direct and proximate result of the collision, negligent acts or omissions set forth above, the Plaintiff, Stephanie Williams was injured and caused to

be hospitalized, required emergency treatment, and was injured about her body, and head, and was unable to work.

11. That as a direct and proximate cause of the collision, negligent acts or omissions set forth above, the Plaintiff, Stephanie Williams incurred pain and suffering in the past, present and future, suffered emotional trauma, continues to suffer emotional traumas and will suffer emotional traumas in the future, and was forced to incur hospital and medical bills for her treatment and will have medical bills in the future; and missed work resulting in monetary loss, and will continue to incur monetary loss in the future.

WHEREFORE, Plaintiff prays that this court enter judgment in favor of Plaintiff in a sum in excess of \$50,000.00 together with cost of suit.

COMPLAINT COUNT II STEPHANIE E. WILLIAMS

COMES now the Plaintiff, Stephanie E. Williams, by and through her attorney, Stephen J. Hough, for her Complaint against the Defendant, MISHIDA JUNICHI AND TOYOTA BOSHOKU AMERICA, INC., states as follows:

- 1. That the Plaintiff is a resident of the State of Illinois.
- 2. That Defendant, TOYOTA BOSHOKU AMERICA, INC. is a corporation doing business in Lawrence County, Illinois.
- 3. That on October 9, 2015, at 3:17 p.m., the Plaintiff, Stephanie Williams was driving a 2010 Chrysler van in a Westerly direction along County Road (CR) 900 N. at its intersection of CR 1500 E., in Lawrence County, Illinois.
- 4. That at the time, date and location aforementioned, the Defendant, Mishida Junichi, an employee of the Defendant, TOYOTA BOSHOKU AMERICA, INC., acting within the scope of his employment, was driving a 2015 Toyota Van in a Southerly direction on CR 1500 E. at its intersection with CR 900 N., in Lawrence County, Illinois.

- 5. That all times herein relevant, the Defendant, Mishida Junichi, was an employee of the Defendant, TOYOTA BOSHOKU AMERICA, INC., and was acting within the scope of his employment.
- 6. That at the time, date and location aforementioned, the Defendant TOYOTA BOSHOKU AMERICA, INC., by and through it employee, Defendant, Mishida Junichi, acting within the scope of his employment, caused the vehicle he was driving, owned by Defendant, TOYOTA BOSHOKU AMERICA, INC., to collide with the vehicle being driven by Plaintiff, Stephanie Williams, striking the Plaintiff's vehicle, causing the Plaintiff and her passengers, Shawn R. Williams and Vera C. Williams to be thrown about the interior of the vehicle she was driving, causing injuries to Plaintiff, Stephanie E. Williams.
- 7. That said injuries to Plaintiff, Stephanie E. Williams caused her to be transported via ambulance to a hospital for treatment of these injuries.
- 8. That at the time, date and location aforementioned, the Defendant, TOYOTA BOSHOKU AMERICA, INC., by and through its employee, Defendant, Mishida Junichi, acting within his scope of employment, was guilty of one or more of the following acts of negligence or omission:
- a. Drove the vehicle he was operating at a speed that was unreasonable and improper given the circumstances of the roadway and traffic, in contravention of 625 ILCS 5/11-601(a), the Illinois Vehicle Code.
- b. Drove the vehicle too fast for conditions existing at the time in contravention to 625 ILCS 5/11-601(a), the Illinois Vehicle Code.
- c. Failed to obey a Stop Sign, when being required to stop, in contravention to 625 ILCS 5/11-601(a), the Illinois Vehicle Code.
- d. Failed to decrease speed while approaching and crossing an intersection in contravention to 625 ILCS 5/11-601(a), the Illinois Vehicle Code.
 - e. Was operating his cell phone while driving.

- 9. That as a direct and proximate result of the collision, negligent acts or omissions set forth above, the Plaintiff, Stephanie Williams was injured and caused to be hospitalized, required emergency treatment, and was injured about her body, and head, and was unable to work.
- 10. That as a direct and proximate cause of the collision, negligent acts or omissions set forth above, the Plaintiff, Stephanie Williams incurred pain and suffering in the past, present and future, suffered emotional trauma, continues to suffer emotional traumas and will suffer emotional traumas in the future, and was forced to incur hospital and medical bills for her treatment and will have medical bills in the future; and missed work resulting in monetary loss, and will continue to incur monetary loss in the future.

WHEREFORE, Plaintiff prays that this court enter judgment in favor of Plaintiff in a sum in excess of \$50,000.00 together with cost of suit.

COMPLAINT COUNT III SHAWN R. WILLIAMS

COMES now the Plaintiff, Shawn R. Williams, by and through his attorney, Stephen J. Hough, for his Complaint against the Defendant, MISHIDA JUNICHI AND TOYOTA BOSHOKU AMERICA, INC., states as follows:

- 1. That the Plaintiff is a resident of the State of Illinois.
- 2. That Defendant, Mishida Junichi is a resident of the State of Indiana.
- 3. That Defendant, TOYOTA BOSHOKU AMERICA, INC. is a corporation doing business in Lawrence County, Illinois.
- 4. That on October 9, 2015, Plaintiff, Shawn Williams was a passenger in a 2010 Chrysler van being driven by Stephanie E. Williams, in a Westerly direction along County Road (CR) 900 N. at its intersection of CR 1500 E in Lawrence County, Illinois.
- 5. That at the time and date aforementioned, the Defendant, Mishida Junichi, an employee of the Defendant, TOYOTA BOSHOKU AMERICA, INC., acting within the

scope of his employment, was driving a 2015 Toyota Van in a Southerly direction on CR 1500 E. at its intersection with CR 900 N., in Lawrence County, Illinois.

- 6. That at the time, date and location aforementioned, the Defendant, Mishida Junichi, an employee of the Defendant, TOYOTA BOSHOKU AMERICA, INC. caused the vehicle he was driving, owned by Defendant, TOYOTA BOSHOKU AMERICA, INC., to collide with the vehicle in which the Plaintiff was a passenger, being driven by Stephanie Williams, striking the Plaintiff's vehicle, causing the Plaintiff to be hurled around the interior of the vehicle, causing injuries to Plaintiff, Shawn R. Williams.
- 7. That at the time, date and location aforementioned, the Defendant, Mishida Junichi, an employee acting within his scope of employment, was guilty of one or more of the following acts of negligence:
- a. Drove his vehicle at a speed that was unreasonable and improper given the circumstances of the roadway and traffic, in contravention of 625 ILCS 5/11-601(a), the Illinois Vehicle Code.
- b. Drove the vehicle too fast for conditions existing at the time in contravention to 625 ILCS 5/11-601(a), the Illinois Vehicle Code.
- c. Failed to obey a Stop Sign, when being required to stop, in contravention to 625 ILCS 5/11-601(a), the Illinois Vehicle Code.
- d. Failed to decrease speed while approaching and crossing an intersection in contravention to 625 ILCS 5/11-601(a), the Illinois Vehicle Code.
 - e. Was operating his cell phone while driving.
- 8. That as a direct and proximate result of the collision, negligent acts or omissions set forth above, the Plaintiff, Shawn Williams sustained injuries to his left knee, suffered cuts, bruises and abrasions to his body, exacerbated an existing pancreatic condition, was caused to suffer pain and suffering in the past, present and future, suffered emotional trauma in the past, present, and future became liable for medical treatment, ambulance service, including helicopter, and continues to be liable

for medical treatment and bills and future medical treatment and bills; suffered in the past from emotional trauma, suffers emotional trauma in the present and will suffer emotional trauma in the future.

9. That as a direct and proximate cause of the collision, negligent acts or omissions set forth above, the Plaintiff, Shawn Williams was caused to miss work, continue to miss work, and will miss work in the future; his residual effects of the injuries sustained in the collision; was caused to use and become liable for various medical apparatus to allow ambulation, was caused to be hospitalized and could be hospitalized in the future, and incurred physical therapy.

WHEREFORE, Plaintiff prays that this court enter judgment in favor of Plaintiff in a sum in excess of \$50,000.00 together with cost of suit.

COMPLAINT COUNT IV SHAWN R. WILLIAMS

COMES now the Plaintiffs, Shawn R. Williams, by and through his attorney, Stephen J. Hough, for his Complaint against the Defendant, MISHIDA JUNICHI AND TOYOTA BOSHOKU AMERICA, INC., states as follows:

- 1. That the Plaintiff is a resident of the State of Illinois.
- 2. That Defendant, TOYOTA BOSHOKU AMERICA, INC. is a corporation doing business in Lawrence County, Illinois.
- 3. That on October 9, 2015, at 3:17 p.m., the Plaintiff, Shawn Williams was a passenger in a 2010 Chrysler van, driven by Stephanie Williams, in a Westerly direction along County Road (CR) 900 N. at its intersection of CR 1500 E in Lawrence County, Illinois.
- 4. That at the time and date aforementioned, the Defendant, Mishida Junichi, an employee of the Defendant TOYOTA BOSHOKU AMERICA, INC., acting within the scope of his employment, was driving a 2015 Toyota Van in a Southerly direction on CR 1500 E. at its intersection with CR 900 N., in Lawrence County, Illinois.

- 5. That at the time, date and location aforementioned, the Defendant TOYOTA BOSHOKU AMERICA, INC., by and through it employee, Defendant, Mishida Junichi, acting within the scope of his employment, caused the vehicle he was driving, owned by Defendant, TOYOTA BOSHOKU AMERICA, INC., to collide with the vehicle being driven by Plaintiff, Stephanie Williams, causing the Plaintiff and passengers, Shawn R. Williams and Vera C. Williams to be thrown about the interior of the vehicle, causing injuries to Plaintiff, Shawn R. Williams.
- 6. That at the time, date and location aforementioned, the Defendant, TOYOTA BOSHOKU AMERICA, INC., by and through its employee, Defendant, Mishida Junichi, an employee acting within his scope of employment, was guilty of one or more of the following acts of negligence or omission:
- a. Drove the vehicle he was operating at a speed that was unreasonable and improper given the circumstances of the roadway and traffic, in contravention of 625 ILCS 5/11-601(a), the Illinois Vehicle Code.
- b. Drove the vehicle too fast for conditions existing at the time in contravention to 625 ILCS 5/11-601(a), the Illinois Vehicle Code.
- c. Failed to obey a Stop Sign, when being required to stop, in contravention to 625 ILCS 5/11-601(a), the Illinois Vehicle Code.
- d. Failed to decrease speed while approaching and crossing an intersection in contravention to 625 ILCS 5/11-601(a), the Illinois Vehicle Code.
 - e. Was operating his cell phone while driving.
- 7. That as a direct and proximate result of the negligent acts or omissions set forth above, the Plaintiff, Shawn Williams was injured and caused to be hospitalized, required emergency treatment, and was injured about his body, and head, and was unable to work.
- 8. That as a direct and proximate cause of the collision and negligent acts or omissions set forth above, the Plaintiff, Shawn Williams incurred pain and suffering in the past, present and future, suffered emotional trauma, continues to suffer emotional

traumas and will suffer emotional traumas in the future, and was forced to incur hospital and medical bills for his treatment and will have medical bills in the future; and missed work resulting in monetary loss, and will continue to incur monetary loss in the future.

WHEREFORE, Plaintiff prays that this court enter judgment in favor of Plaintiff in a sum in excess of \$50,000.00 together with cost of suit.

COMPLAINT COUNT V VERA C. WILLIAMS

COMES now the Plaintiff, Vera C. Williams, by and through her attorney, Stephen J. Hough, for her Complaint against the Defendant, MISHIDA JUNICHI AND TOYOTA BOSHOKU AMERICA, INC., states as follows:

- 1. That the Plaintiff is a resident of the State of Illinois.
- 2. That Defendant, Mishida Junichi is a resident of the State of Indiana.
- 3. That Defendant, TOYOTA BOSHOKU AMERICA, INC. is a corporation doing business in Lawrence County, Illinois.
- 4. That on October 9, 2015, Plaintiff, Vera Williams was a passenger in a 2010 Chrysler van being driven by Stephanie E. Williams, in a Westerly direction along County Road (CR) 900 N. at its intersection of CR 1500 E in Lawrence County, Illinois.
- 5. That at the time and date aforementioned, the Defendant, Mishida Junichi, an employee of the Defendant, TOYOTA BOSHOKU AMERICA, INC., acting within the scope of his employment, was driving a 2015 Toyota Van in a Southerly direction on CR 1500 E. at its intersection with CR 900 N., in Lawrence County, Illinois.
- 6. That at the time, date and location aforementioned, the Defendant, Mishida Junichi, an employee of the Defendant, TOYOTA BOSHOKU AMERICA, INC. caused the vehicle he was driving, owned by Defendant, TOYOTA BOSHOKU AMERICA, INC., to collide with the vehicle in which the Plaintiff was a passenger, being driven by Plaintiff, Stephanie Williams, striking the Plaintiff's vehicle, causing the Plaintiff to be hurled around the interior of the vehicle, causing injuries to Plaintiff, Vera C. Williams.

- 7. That at the time, date and location aforementioned, the Defendant, Mishida Junichi, an employee acting within his scope of employment, was guilty of one or more of the following acts of negligence:
- a. Drove his vehicle at a speed that was unreasonable and improper given the circumstances of the roadway and traffic, in contravention of 625 ILCS 5/11-601(a), the Illinois Vehicle Code.
- b. Drove the vehicle too fast for conditions existing at the time in contravention to 625 ILCS 5/11-601(a), the Illinois Vehicle Code.
- c. Failed to obey a Stop Sign, when being required to stop, in contravention to 625 ILCS 5/11-601(a), the Illinois Vehicle Code.
- d. Failed to decrease speed while approaching and crossing an intersection in contravention to 625 ILCS 5/11-601(a), the Illinois Vehicle Code.
 - e. Was operating his cell phone while driving.
- 8. That as a direct and proximate result of the negligent acts or omissions set forth above, the Plaintiff, Vera Williams was injured and caused to be hospitalized, required emergency treatment, and was injured about her body, and head, and was unable to work.
- 9. That as a direct and proximate cause of the collision and negligent acts or omissions set forth above, the Plaintiff, Vera Williams incurred pain and suffering in the past, present and future, suffered emotional trauma, continues to suffer emotional traumas and will suffer emotional traumas in the future, and was forced to incur hospital and medical bills for her treatment and will have medical bills in the future; and missed work resulting in monetary loss, and will continue to incur monetary loss in the future.

WHEREFORE, Plaintiff prays that this court enter judgment in favor of Plaintiff in a sum in excess of \$50,000.00 together with cost of suit.

COMPLAINT COUNT VI VERA C. WILLIAMS

COMES now the Plaintiffs, Vera C. Williams, by and through her attorney, Stephen J. Hough, for her Complaint against the Defendant, MISHIDA JUNICHI AND TOYOTA BOSHOKU AMERICA, INC., states as follows:

- 1. That the Plaintiff is a resident of the State of Illinois.
- 2. That Defendant, TOYOTA BOSHOKU AMERICA, INC. is a corporation doing business in Lawrence County, Illinois.
- 3. That on October 9, 2015, at 3:17 p.m., the Plaintiff, Vera Williams was a passenger in a 2010 Chrysler van, driven by Plaintiff, Stephanie Williams, in a Westerly direction along County Road (CR) 900 N. at its intersection of CR 1500 E in Lawrence County, Illinois.
- 4. That at the time and date aforementioned, the Defendant, Mishida Junichi, an employee of the Defendant TOYOTA BOSHOKU AMERICA, INC., acting within the scope of his employment, was driving a 2015 Toyota Van in a Southerly direction on CR 1500 E. at its intersection with CR 900 N., in Lawrence County, Illinois.
- 5. That all times herein relevant, the Defendant, Mishida Junichi, was an employee of the Defendant, TOYOTA BOSHOKU AMERICA, INC., and was acting within the scope of his employment.
- 6. That at the time, date and location aforementioned, the Defendant TOYOTA BOSHOKU AMERICA, INC., by and through it employee, Defendant, Mishida Junichi, acting within the scope of his employment, caused the vehicle he was driving, owned by Defendant, TOYOTA BOSHOKU AMERICA, INC., to collide with the vehicle being driven by Plaintiff, Stephanie Williams, striking the Plaintiff's vehicle, causing the Plaintiff and her passengers, Shawn R. Williams and Vera C. Williams to be thrown about the interior of the vehicle she was driving, causing injuries to Plaintiff, Vera C. Williams.
- 7. That at the time, date and location aforementioned, the Defendant, TOYOTA BOSHOKU AMERICA, INC., by and through its employee, Defendant, Mishida Junichi,

an employee acting within his scope of employment, was guilty of one or more of the following acts of negligence or omission:

- a. Drove the vehicle he was operating at a speed that was unreasonable and improper given the circumstances of the roadway and traffic, in contravention of 625 ILCS 5/11-601(a), the Illinois Vehicle Code.
- b. Drove the vehicle too fast for conditions existing at the time in contravention to 625 ILCS 5/11-601(a), the Illinois Vehicle Code.
- c. Failed to obey a Stop Sign, when being required to stop, in contravention to 625 ILCS 5/11-601(a), the Illinois Vehicle Code.
- d. Failed to decrease speed while approaching and crossing an intersection in contravention to 625 ILCS 5/11-601(a), the Illinois Vehicle Code.
 - e. Was operating his cell phone while driving.
- 8. That as a direct and proximate result of the negligent acts or omissions set forth above, the Plaintiff, Vera Williams was injured and caused to be hospitalized, required emergency treatment, and was injured about her body, and head, and was unable to work.
- 9. That as a direct and proximate cause of the collision and negligent acts or omissions set forth above, the Plaintiff, Vera Williams incurred pain and suffering in the past, present and future, suffered emotional trauma, continues to suffer emotional traumas and will suffer emotional traumas in the future, and was forced to incur hospital and medical bills for her treatment and will have medical bills in the future; and missed work resulting in monetary loss, and will continue to incur monetary loss in the future.

WHEREFORE, Plaintiff prays that this court enter judgment in favor of Plaintiff in a sum in excess of \$50,000.00 together with cost of suit.

PLAINTIFFS DEMAND TRIAL BY JURY ON ALL COUNTS

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STEPHEN J. HOUGH LAW OFFICE of STEPHEN J. HOUGH

ARDC: 6192241 110 S. Whittle Avenue Olney, IL 62450

Phone: 618-395-6181

Email: SteveHoughLaw@gmail.com

AFFIDAVIT OF ATTORNEY

The Plaintiff's attorney, STEPHEN J. HOUGH, being first duly sworn upon his oath, states:

- 1. That Affiant is the attorney for the Plaintiff, SHAWN R. WILLIAMS.
- 2. That on his behalf, he has filed such in the Court of the Second Judicial Circuit, Richland County, Illinois, naming Defendants, MISHIDA JUNICHI AND TOYOTA BOSHOKU AMERICA, INC..
- 3. That in the prayer for damages, Plaintiff seeks damages in excess of \$50,000 and further, money will reasonably and fairly compensate Plaintiff for his injuries, damages and costs of suit.
 - 4. That Plaintiff seeks in excess of \$50,000.
- 5. To the knowledge and belief of Plaintiff's attorney, the amount sought by Plaintiff in excess of \$50,000 is reasonable.

Further Affiant sayeth not.

DATED THIS ____ day of October, 2017.

STEPHEN J. HOUGH

Subscribed and sworn to before me this _____ day of October, 2017.

(seal)

OFFICIAL SEAL NANCY J GCONNELL NOTARY PUBLIC, STATE OF ILLINOIS My Commission Expires 04/05/2021

Notary Public

INSTRUMENT PREPARED BY:

Stephen J. Hough, Attorney at Law 110 S. Whittle Ave. Olney, IL 62450 618-395-6181

ARDC: 6192241 Phone: (618) 395-6181

SteveHoughLaw@gmail.com

AFFIDAVIT OF ATTORNEY

The Plaintiff's attorney, STEPHEN J. HOUGH, being first duly sworn upon his oath, states:

- 1. That Affiant is the attorney for the Plaintiff, STEPHANIE E. WILLIAMS.
- 2. That on her behalf, he has filed such in the Court of the Second Judicial Circuit, Richland County, Illinois, naming Defendants, MISHIDA JUNICHI AND TOYOTA BOSHOKU AMERICA, INC..
- 3. That in the prayer for damages, Plaintiff seeks damages in excess of \$50,000 and further, money will reasonably and fairly compensate Plaintiff for her injuries, damages and costs of suit.
 - 4. That Plaintiff seeks in excess of \$50,000.
- 5. To the knowledge and belief of Plaintiff's attorney, the amount sought by Plaintiff in excess of \$50,000 is reasonable.

Further Affiant sayeth not.

DATED THIS ____ day of October, 2017.

STEPHĖN J. HOUGH

Subscribed and sworn to before me this <u>5</u> day of October, 2017.

(seal)

OFFICIAL SEAL
NAMCY J OCONNELL
NOTARY PUBLIC, STATE OF ILLINOIS
My Commission Expires 04/05/2021

INSTRUMENT PREPARED BY:

Stephen J. Hough, Attorney at Law

110 S. Whittle Ave. Olney, IL 62450

618-395-6181

ARDC: 6192241

Phone: (618) 395-6181

SteveHoughLaw@gmail.com

AFFIDAVIT OF ATTORNEY

The Plaintiff's attorney, STEPHEN J. HOUGH, being first duly sworn upon his oath, states:

- 1. That Affiant is the attorney for the Plaintiff, VERA C. WILLIAMS.
- 2. That on her behalf, he has filed such in the Court of the Second Judicial Circuit, Richland County, Illinois, naming Defendants, MISHIDA JUNICHI AND TOYOTA BOSHOKU AMERICA, INC..
- 3. That in the prayer for damages, Plaintiff seeks damages in excess of \$50,000 and further, money will reasonably and fairly compensate Plaintiff for her injuries, damages and costs of suit.
 - 4. That Plaintiff seeks in excess of \$50,000.
- 5. To the knowledge and belief of Plaintiff's attorney, the amount sought by Plaintiff in excess of \$50,000 is reasonable.

Further Affiant sayeth not.

DATED THIS ____ day of October, 2017.

Subscribed and sworn to before me this 5 day of October, 2017.

(seal)

INSTRUMENT PREPARED BY:

Stephen J. Hough, Attorney at Law 110 S. Whittle Ave.

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